

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
2018 JUN 20 PM 12:33
OFFICE OF THE CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

8:17CR286

SECOND SUPERSEDING
INDICTMENT

BRIJIDO BELTRAN-RODELO, a.k.a.
"Toledo", JOHN F. HALLER III, ANA
KARLA RODRIGUEZ-TORREZ, FIDEL
GIOVANNI AVILA-MONZON, MATIAN
ALFONSO CEBALLOS-AGUIRRE, JESUS
FRANCISCO MONZON-MORENO, JUAN
VEGA-DIAZ, MARCOS MONZON-RIVAS,
a.k.a. "Kochita", DORA MARIA ORTIZ-
TORRES, and JOSE LUIS MURILLO, a.k.a.
"Gordo",

Defendants.

[21 U.S.C. §§ 841(a)(1)&(b)(1)
21 U.S.C. § 846, 18 U.S.C. § 1956(h),
18 U.S.C. § 1956(a)(2)(B)(i), 18 U.S.C.
§ 1956(a)(2)(A), 18 U.S.C. § 1956(h),
18 U.S.C. § 1952(a)(1)&(a)(3),
18 U.S.C. § 2, 21 U.S.C. § 853(p)]

The Grand Jury charges:

COUNT I

Between an unknown date, as early as in or about June 2016, and on or about September 5, 2017, in the District of Nebraska and elsewhere, the Defendants, BRIJIDO BELTRAN-RODELO, a.k.a. "Toledo", JOHN F. HALLER III, and JOSE LUIS MURILLO, a.k.a. "Gordo", knowingly and intentionally combined, conspired, confederated and agreed together and with other persons known and unknown to the Grand Jury, to commit the following offense against the United States: to distribute and possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) &(b)(1), and Title 21, United States Code, Section 846.

COUNT II

On or about August 4, 2017, in the District of Nebraska and elsewhere, JOSE LUIS MURILLO, a.k.a. “Gordo”, Defendant herein, did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 21, United States Code, Section 841(b)(1).

COUNT III

On or about August 12, 2017, in the District of Nebraska, JOSE LUIS MURILLO, a.k.a. “Gordo”, Defendant herein, did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 21, United States Code, Section 841(b)(1).

COUNT IV

On or about August 29, 2017, in the District of Nebraska, JOSE LUIS MURILLO, a.k.a. “Gordo”, Defendant herein, did knowingly and intentionally distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 21, United States Code, Section 841(b)(1).

COUNTS V, VI, & VII

On or about the following dates, in the District of Nebraska, the Defendants, ANA KARLA RODRIGUEZ-TORREZ and JOSE LUIS MURILLO, a.k.a. “Gordo”, did transport, transmit, or transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States, knowing that the monetary instrument or funds involved in the transportation, transmission, or transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, or transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, to wit: Distribution and Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine, in violation of Title 21, United States Code, Sections 841 and 846.

COUNT	DATE (on or about)	DEFENDANT	AMOUNT	TRANSACTION
V	July 28, 2017	ANA KARLA RODRIGUEZ-TORREZ	\$992	At the direction of a third party, Defendant wire transferred funds to Mario Ramos-Jimenez in Culiacan, Mexico
VI	December 19, 2016	JOSE LUIS MURILLO, a.k.a. “Gordo”	\$500	At the direction of Defendant, a third party wire transferred funds from Omaha, Nebraska, to Carlos Murillo-Hernandez in Fresnillo, Mexico
VII	December 20, 2016	JOSE LUIS MURILLO, a.k.a. “Gordo”	\$1,500	At the direction of Defendant, a third party wire transferred funds from Omaha, Nebraska, to Silvia Villarreal-Campos in Fresnillo, Mexico

In violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i) and 2.

COUNT VIII

1. Between an unknown date, as early as in or about June 2016 and on or about

January 2, 2018, in the District of Nebraska and elsewhere, the Defendants, ANA KARLA RODRIGUEZ-TORREZ, FIDEL GIOVANNI AVILA-MONZON, DORA MARIA ORTIZ-TORRES, MATIAN ALFONSO CEBALLOS-AGUIRRE, JESUS FRANCISCO MONZON-MORENO, BRIJIDO BELTRAN-RODELO, a.k.a. "Toledo", JUAN VEGA-DIAZ, MARCOS MONZON-RIVAS, a.k.a. "Kochita", and JOSE LUIS MURILLO, a.k.a. "Gordo", did knowingly and intentionally combine, conspire and agree with other persons known and unknown to the Grand Jury to commit certain offenses under Title 18, United States Code, Section 1956, to wit:

a. to transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from a place in the United States to or through a place outside the United States, knowing that the monetary instrument or funds involved in the transportation, transmission, or transfer represent the proceeds of some form of unlawful activity and knowing that such transportation, transmission, or transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, to wit: Distribution and Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine, in violation of Title 21, United States Code, Sections 841 and 846, in violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i) and Title 18, United States Code, Section 2; and

b. to transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from a place in the United States to or through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, that is Distribution and Conspiracy to Distribute Methamphetamine, in violation of Title 21, United States Code, Sections 841 and 846, in violation of Title 18, United States Code, Sections

1956(a)(2)(A) and Title 18, United States Code, Section 2.

MANNER AND MEANS

2. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

3. It was part of the conspiracy for its members, acting interdependently, to effect the international transfer of funds from the District of Nebraska and elsewhere within the United States to multiple recipients residing in multiple locations in Mexico.

4. It was further part of the conspiracy for some of its members to rotate into and out of the United States from Mexico. Co-conspirators residing in Mexico would receive funds wire transferred by multiple co-conspirators located in the District of Nebraska and elsewhere within the United States. Co-conspirators residing in the District of Nebraska and elsewhere within the United States would effect the international transfer of funds to multiple co-conspirators located in Mexico.

5. It was further part of the conspiracy for some of its members to recruit persons and to enlist the cooperation of third parties in the District of Nebraska and elsewhere within the United States and in Mexico to effect the international transfer of funds via wire transfer.

6. It was further part of the conspiracy that some of its members operating in the United States would use alias names or variations of names at times to effect the international transfer of funds to Mexico.

7. It was further part of the conspiracy that, on or about July 28, 2017, Defendant ANA KARLA RODRIGUEZ-TORREZ, wire transferred funds on behalf of a third party from Omaha, Nebraska, to Mario Ramos-Jimenez, a recipient in Mexico.

8. It was further part of the conspiracy that, on or about December 19, 2016, a third

party wire transferred funds on behalf of Defendant JOSE LUIS MURILLO, a.k.a. "Gordo" from Omaha, Nebraska, to Carlos Murillo-Hernandez, a recipient in Mexico.

CLF 9 8. It was further part of the conspiracy that, on or about December 20, 2016, a third party wire transferred funds on behalf of Defendant JOSE LUIS MURILLO, a.k.a. "Gordo" from Omaha, Nebraska, to Silvia Villareal-Campos, a recipient in Mexico.

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION

1. The allegations contained in Counts I, IV, and V-VIII of this Second Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, and Title 18 United States Code, Section 982(a)(1).

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 841 or 846, the Defendants, BRIJIDO BELTRAN-RODELO, a.k.a. "Toledo", JOHN F. HALLER III, and JOSE LUIS MURILLO, a.k.a. "Gordo", shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses. Such property includes, but is not limited to, the property described below.

3. Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of an offense in violation of Title 18, United States Code, Section 1956, the Defendants, ANA KARLA RODRIGUEZ-TORREZ, FIDEL GIOVANNI AVILA-MONZON, DORA MARIA ORTIZ-TORRES, MATIAN ALFONSO CEBALLOS-AGUIRRE, JESUS FRANCISCO MONZON-MORENO, BRIJIDO BELTRAN-RODELO, a.k.a. "Toledo", JUAN VEGA-DIAZ, MARCOS

MONZON-RIVAS, a.k.a. “Kochita”, and JOSE LUIS MURILLO, a.k.a. “Gordo”, shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property. Such property includes, but is not limited to, the property described below.

4. The property to be forfeited includes, but is not limited to, the following:

a. \$72,585.00 in United States currency seized on or about September 5, 2017, from a residence at 422 N. 39th Street, Council Bluffs, Iowa.

b. \$95,000.00 in United States currency seized on or about July 6, 2017 from a grey 2009 Hyundai.

c. A Money Judgment against the Defendants in favor of the United States of America:

i. said Judgment equal to the value of the property constituting, or derived from, any proceeds the Defendants obtained, directly or indirectly, as a result of the offenses alleged in Counts I and IV of this Second Superseding Indictment, Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine, in violation of Title 21, United States Code, Section 846, and Distribution of Methamphetamine, in violation of Title 21, United States Code, Section 841, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts I and IV of this Second Superseding Indictment, Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine, in violation of Title 21, United States Code, Section 846, and Distribution of Methamphetamine, in violation of Title 21, United States Code, Section 841;

ii. said Judgment equal to the value of the property involved in Counts V through VIII of this Second Superseding Indictment, Laundering and Conspiracy to Launder Monetary Instruments, in violation of Title 18, United States Code, Section 1956; and

5. . . . If any of the property described above, as a result of any act or omission of the Defendant[s]:

- i. . . . cannot be located upon the exercise of due diligence;
- ii. . . . has been transferred or sold to, or deposited with, a third party;
- iii. . . . has been placed beyond the jurisdiction of the court;
- iv. . . . has been substantially diminished in value; or
- v. . . . has been commingled with other property which cannot be divided without difficulty,

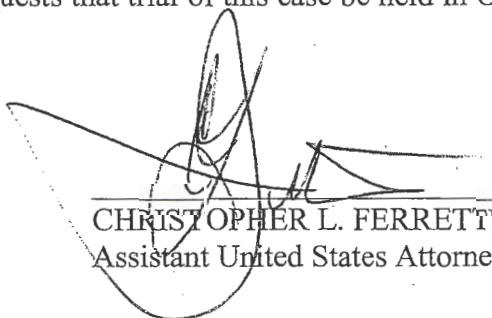
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

In violation of Title 21, United States Code, Section 853.

A TRUE BILL.

/ FOREPERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.



CHRISTOPHER L. FERRETTI
Assistant United States Attorney